## REARDON & SCLAFANI, P.C.

ATTORNEYS AT LAW

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Application granted. The deadline to complete expert discovery and all discovery is extended to 4/15/2021. The case management conference scheduled for 2/24/2021 is adjourned to 4/21/2021 at 10:00 a.m.

ce)

MICHAEL V. SCLAFANI VINCENT M. SCLAFANI NICHOLAS J. ACCURSO

EDWARD D. SCHMITT' JULES J. RAVO OF COUNSEL

\*Also admitted in CA

SO ORDERED.

Philip M. Halpern

United States District Judge

Dated: New York, New York December 15, 2020

BY ECF

Hon. Philip M. Halpern, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

> RE: Grant v. PV Holding, et ano. 20 CV 6431 (PMH)

Dear Judge Halpern:

As you know, we represent the defendants in regard to the above-captioned matter and write the Court, with the consent of plaintiff's counsel, to request a 60-day extension to complete discovery.

All paper discovery has been completed, medical records and authorizations have been exchanged and all parties' depositions have been completed. A physical examination of the plaintiff has been scheduled, unfortunately, however, the available for the examination is February 8, 2021. the earliest

In light of the foregoing, we are requesting an extension to complete all discovery, including expert disclosure until April 15, 2021 to allow our examining physician to review the records supplied to him, examine the plaintiff and draft his report detailing his findings.

By:

Respectfully,

REARDON & SCLAFANI, P.C.

NICHOLAS J. ACCURSO (NA 1853)

NJA/dmb

cc: Finkelstein & Partners, LLP Ronald Rosenkranz, Esq.

Attorneys for Plaintiff